

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MIKE KREIDLER, Insurance Commissioner for
the State of Washington and as Receiver for
Cascade National Insurance Company, in
Liquidation,

Plaintiff,

v.

DANNY L. PIXLER and ROXANN PIXLER,
individually and their marital community;
ANTHONY HUFF and SHERI HUFF,
individually and their marital community;
AMERICAN STAFF RESOURCES OF
CALIFORNIA, INC., a Delaware corporation;
CERTIFIED SERVICES, INC., a Nevada
corporation; MIDWEST MERGER
MANAGEMENT, LLC, a Kentucky Limited
Liability Company; and JOHN DOES 1 – 10,

Defendants.

NO. C06-697 RSL

DECLARATION OF VICTORIA L.
VREELAND IN SUPPORT OF
PLAINTIFF'S MOTION FOR ORDER
ESTABLISHING A DISCOVERY PLAN

**NOTED FOR MOTION CALENDAR:
July 20, 2007**

Victoria L. Vreeland declares and states as follows:

DECLARATION OF VICTORIA L. VREELAND
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ORDER ESTABLISHING A DISCOVERY PLAN
PAGE 1 of 2
No. C06-697 RSL
180588 v2

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
600 UNIVERSITY STREET, SUITE 2100
Seattle, Washington 98101
(206) 676-7500 • FACSIMILE (206) 676-7575

1. I am an attorney and one of the counsel of record for plaintiff in this matter. I am competent to make this Declaration, which is based upon personal knowledge.

2. Attached hereto are true and correct copies of the following:

Exhibit A March 20, 2007 letter from plaintiff's counsel to defense counsel proposing specific discovery plan

Exhibit B March 26, 2007 email and letter from Donald Cox with deposition notices

Exhibit C June 26, 2007 deposition notices from defense

3. The factual matters set forth in Plaintiff's Motion regarding the discovery proceedings and communications with opposing counsel are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury of the laws of the State of Washington that the above is true and correct to the best of my knowledge and belief.

Dated this 5th day of July, 2007


Victoria L. Vreeland

DECLARATION OF VICTORIA L. VREELAND
IN SUPPORT OF PLAINTIFF'S MOTION FOR
ORDER ESTABLISHING A DISCOVERY PLAN

PAGE 2 of 2

No. C06-697 RSL

PLD - Dec of VLV Re Mtn for Discovery Plan.doc

LAW OFFICES
GORDON, THOMAS, HONEYWELL, MALANCA,
PETERSON & DAHEIM LLP
600 UNIVERSITY STREET, SUITE 2100
Seattle, Washington 98101
(206) 676-7500 - FACSIMILE (206) 676-7575